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March 29, 2012

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RE: UT Docket No. 12-035-70  
DPU 1<sup>st</sup> Set Data Request (1-3)

Please find enclosed Rocky Mountain Power's Responses to DPU 1<sup>st</sup> Set Data Requests 1.1 – 1.3. Also provided electronically is Attachment DPU 1.2.

If you have any questions, please call Barry Bell at (801) 220-4985.

Sincerely,

  
Dave Taylor  
Manager, Regulation

**DPU Data Request 1.1**

Does this request for a major event determination (i.e., the entire period from January 18 – January 21) comply with the requirements of IEEE-1366 for the determination of one major event or should the request be considered as two separate major events? The Company has provided one analysis for January 18 – January 19 and a separate analysis for January 21. How is January 20<sup>th</sup> being considered by the Company? Please provide an explanation based upon the requirements of IEEE-1366.

**Response to DPU Data Request 1.1**

As noted in the description section of the major event filing document, there were two waves of the same storm system, separated by one day, January 20. There were no new operational impacts on the 20<sup>th</sup> due to the storm and only a few customers remained out, so field operations were no longer stressed by previous days' impacts of the storm. Operationally, January 20 was a normal day (an underlying day). The Company did not include this day's minutes in the event and calculated the event metrics in two 'waves', clearly aligned with the two waves of the storm.

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DPU Data Request 1.2

**DPU Data Request 1.2**

What is the Company doing to prevent/minimize pole fires? Please explain and provide supporting documentation.

**Response to DPU Data Request 1.2**

Following the 2007 pole fires, the Company investigated the issue and made changes in standards to mitigate for pole fires. With the 2012 pole fires, the Company is taking the next step by initiating rigorously documented field trials of mitigation approaches that have a high likelihood of solving the problem. Those approaches include installing metal gains and insulator pin bonding on selected poles in the most trouble prone areas. Please refer to Attachment DPU 1.2.

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### **DPU Data Request 1.3**

In the Company's use of IEEE-1366, please identify how the Company defines the term "day," i.e., calendar day, a twenty-four hour period, etc. Is this definition consistently applied in the Company's service quality calculations? Please explain and provide supporting documentation.

### **Response to DPU Data Request 1.3**

The Company uses calendar days to determine reliability metrics reported in service quality reviews and to calculate annual major event thresholds. However, any 24-hour period can be used to determine whether a "day" has met the threshold and therefore become a major event. In most cases, the 24-hour period is indeed the calendar day, but upon occasion, a rolling 24-hour period is applied if the event spanned two calendar days and neither calendar day alone met the threshold, but the cumulative customer minutes lost in some 24-hour period within those two days did meet the threshold, (e.g., noon day one through noon day two).